

40 Exchange Place, 18th Floor New York, New York 10005 646-741-0229

maxnicholasllc.com

March 6, 2025

BY ECF

Hon. Jennifer L. Rochon United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 Consent Letter Motion GRANTED. The sentencing is adjourned from March 26, 2025 to May 21, 2025 at 12:00 p.m.

Dated: March 6, 2025 New York, New York SO ORDERED.

JENNIEER L. ROCHON United States District Judge

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United States v. Charles Starks, 24 Cr. 126 (JLR)

Dear Judge Rochon:

My firm is counsel for Charles Starks in the above-captioned case. Mr. Starks is presently scheduled to be sentenced before this Court on March 26, 2025, with his presentencing memorandum due on March 12, 2025.

I respectfully write to request that Mr. Starks's sentencing be adjourned until either mid- to late May 2025 (but before May 27, on which date I am scheduled to start a trial) or any time after June 9, 2025 (after which my May 27 trial should have concluded). This is the second request that the defense has made to adjourn the sentencing.

The reason for this request is that we have not yet received the draft version of the Probation Department's Pre-Sentence Investigation Report for Mr. Starks. I have spoken with the Government, and it is my understanding that as of yesterday, March 5, they also have not received a draft. Once the defense receives a draft, we will review promptly with Mr. Starks, submit any objections to the Probation Department within 14 days, and complete our sentencing memorandum as promptly as possible; however, given the importance of the factual components of the PSR to the process of preparing our sentencing memorandum and preparing for the sentencing itself, I believe that an adjournment until at least mid-May is necessary in order to competently represent Mr. Starks for purposes of sentencing.



The Government consents to this request. I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Max Nicholas

Max Nicholas LLC 40 Exchange Place Suite 1800 New York, NY 10005 646-741-0229 max@maxnicholasllc.com